

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES FLETCHER,)
)
)
Plaintiff,) Case No. 20 C 4768
)
) Judge Andrea R. Wood
v.)
)
JEROME BOGUCKI, ANTHONY)
NORADIN, RAYMOND SCHALK,) Magistrate Judge Maria Valdez
ANTHONY WOJCIK, UNKNOWN CITY OF)
CHICAGO POLICE OFFICERS, and the)
CITY OF CHICAGO,)
)
Defendants.)

**CITY OF CHICAGO'S MOTION FOR EXTENSION
OF TIME TO FILE RESPONSIVE PLEADING**

Defendant, City of Chicago (“City”), by its attorney, Terrence M. Burns of Reiter Burns LLP, for its motion for an extension of time to answer or otherwise plead, to and including October 30, 2020, states:

1. The City’s responsive pleading to plaintiff’s complaint was due on September 30, 2020. Undersigned counsel has just been retained to represent the City in this matter.
2. Defendant City requests an extension of time to file its responsive pleading. Plaintiff’s complaint consists of eleven separate counts and 201 paragraphs. This requested extension is not sought for purposes of delay, but is needed to allow the City’s counsel time to gather information and investigate the allegations in plaintiff’s complaint.

3. No prejudice will be suffered by any party as a result of the requested extension.

WHEREFORE, Defendant, City of Chicago, requests an extension of time to answer or otherwise plead, to and including October 30, 2020, and for any other relief this Court deems appropriate.

Respectfully submitted,

MARK A. FLESSNER

Corporation Counsel of the City of Chicago

By: /s/ Daniel M. Noland
Special Assistant Corporation Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on **September 30, 2020**, I electronically filed the foregoing **Defendant City of Chicago's Motion for Extension of Time** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to counsel of record.

/s/ Daniel M. Noland